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DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF WATER QUALITY

288 North 1460 West P.O. Box 144870 Salt Lake City, Utah 84114-4870 (801) 538-6146 Voice (801) 538-6016 Fax (801) 536-4414 T.D.D.



January 8, 1998

Pat Gochnour Gochnour & Associates, Inc. P.O. Box 3207 Englewood, CO 80155

Subject:

Ground Water Classification for the Summo Site, Lisbon Valley, Utah, Permit No.

UGW370005

Dear Mr. Gochnour:

We have received and reviewed the ground water quality data, dated January 5, 1998. The determination of a ground water classification, as per R317-6-3, is defined as follows:

Class-I:

Total dissolved solids <500 mg/l, with no contaminant concentrations

exceeding the ground water standards listed in Table 1.

Class-II:

Total dissolved solids >500 mg/l, but less than 3,000 mg/l, with no

contaminant concentrations exceeding the ground water standards listed in

Table 1.

Class-III:

Total dissolved solids > 3,000 mg/l, but less than 10,000 mg/l or one or more

contaminant concentrations exceeding the ground water standards listed in

Table 1.

From the data submitted, the total dissolved solids would place the classification as Class-II. However, in some wells gross alpha and gross beta particle activity exceed that of the ground water standards in Table one. In all well samples, the Uranium exceeds the proposed EPA MCL of 14 pCi/l. While the value for Uranium has not yet been adopted by the Utah Division of Water Quality, the Utah Division of Radiation Control has adopted the CFR 40 ruling for Class-I Uranium Mill sites of 30 pCi/l. All well samples exceed this value as well. In reviewing these data, it is determined that the permit levels will be based on the Class-III definition. Upon completion of the accelerated monitoring requirements, as outlined in the above referenced permit, actual protection levels will



January 8, 1998 Page 2

be established through permit modification. Should you have any questions, please call Keith Eagan at 801-538-56017.

Sincerely,

Dennis Frederick, Manager

Ground Water Protection Section

DF:kee

cc: Bob Prescott, Summo USA Corporation

Dave Arriotti, South East District Engineer

Lynn Jackson, BLM Moab Office

Tony Gallegos, DOGM

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